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CENTRAL DIST. OF CALIF.
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8
9 **UNITED STATES DISTRICT COURT**
CENTRAL DISTRICT OF CALIFORNIA

10 KATIE JOHNSON

11 **ED CV**
Plaintiff

CASE NUMBER:

12 16-00797 DMG (KS)To be supplied by the Clerk of
The United States District Court

13 DONALD J. TRUMP and

14 JEFFREY E. EPSTEIN

15 Defendant(s).

16 **COMPLAINT FOR CLAIM RELIEF DUE TO:**

1. SEXUAL ABUSE UNDER THREAT OF HARM
2. CONSPIRACY TO DEPRIVE CIVIL RIGHTS

17 Plaintiff Katie Johnson, for causes of actions against Defendants Donald J. Trump and
18 Jeffrey E. Epstein, alleges as follows:19 **JURISDICTION**20 1. Jurisdiction is pursuant to the law of Diversity, 28 U.S.C. ; 1332, as plaintiff resides in the state
21 of California while defendants reside in the state of New York and the action is for damages above
22 \$75,000.23 **VENUE**24 2. The venue is established as the Eastern Division of the United States Court Central District
25 of California because the plaintiff resides in San Bernadino County, State of California

PARTIES

3. The Plaintiff, Katie Johnson, resides in the State of California.

4. The Defendants, Donald J. Trump and Jeffrey E. Epstein, each reside in the State of New York.

FACTUAL ALLEGATIONS

7 5. The Plaintiff, Katie Johnson, alleges that the Defendants, Donald J. Trump and Jeffrey E.
8 Epstein, did willfully and with extreme malice violate her Civil Rights under 18 U.S.C. ; 2241 by
9 sexually and physically abusing Plaintiff Johnson by forcing her to engage in various perverted and
10 depraved sex acts by threatening physical harm to Plaintiff Johnson and also her family.

11 6. The Plaintiff, Katie Johnson, alleges that the Defendants, Donald J. Trump and Jeffrey E.
12 Epstein, also did willfully and with extreme malice violate her Civil Rights under 42 U.S.C. ; 1985 by
13 conspiring to deny Plaintiff Johnson her Civil Rights by making her their sex slave.

14 7. The Plaintiff, Katie Johnson, alleges she was subject to extreme sexual and physical abuse by
15 the Defendants, Donald J. Trump and Jeffrey E. Epstein, including forcible rape during a four
16 month time span covering the months of June-September 1994 when Plaintiff Johnson was still only
17 a minor of age 13.

18 8. The Plaintiff, Katie Johnson, alleges she was enticed by promises of money and a modeling
19 career to attend a series of underage sex parties held at the New York City residence of Defendant
20 Jeffrey E. Epstein and attended by Defendant Donald J. Trump.

21 9. On the first occasion involving the Defendant, Donald J. Trump, the Plaintiff, Katie Johnson,
22 was forced to manually stimulate Defendant Trump with the use of her hand upon Defendant
23 Trump's erect penis until he reached sexual orgasm.

24 10. On the second occasion involving the Defendant, Donald J. Trump, the Plaintiff, Katie
25 Johnson, was forced to orally copulate Defendant Trump by placing her mouth upon Defendant
26 Trump's erect penis until he reached sexual orgasm.

1 11. On the third occasion involving the Defendant, Donald J. Trump, the Plaintiff, Katie Johnson,
2 was forced to engage in an unnatural lesbian sex act with her fellow minor and sex slave, Maria Doe,
3 age 12, for the sexual enjoyment of Defendant Trump. After this sex act, both minors were forced
4 to orally copulate Defendant Trump by placing their mouths simultaneously on his erect penis until
5 he achieved sexual orgasm. After zipping up his pants, Defendant Trump physically pushed both
6 minors away while angrily berating them for the "poor" quality of their sexual performance.

7 12. On the fourth and final sexual encounter with the Defendant, Donald J. Trump, the Plaintiff,
8 Katie Johnson, was tied to a bed by Defendant Trump who then proceeded to forcibly rape Plaintiff
9 Johnson. During the course of this savage sexual attack, Plaintiff Johnson loudly pleaded with
10 Defendant Trump to "please wear a condom". Defendant Trump responded by violently striking
11 Plaintiff Johnson in the face with his open hand and screaming that "he would do whatever he
12 wanted" as he refused to wear protection. After achieving sexual orgasm, the Defendant, Donald J.
13 Trump put his suit back on and when the Plaintiff, Katie Johnson, in tears asked Defendant Trump
14 what would happen if he had impregnated her, Defendant Trump grabbed his wallet and threw
15 some money at her and screamed that she should use the money "to get a fucking abortion".

16 13. On the first occasion involving the Defendant, Jeffrey E. Epstein, the Plaintiff, Katie Johnson,
17 was forced to disrobe into her bra and panties and to give a full body massage to Defendant Epstein
18 while he was completely naked. During the massage, Defendant Epstein physically forced Plaintiff
19 Johnson to touch his erect penis with her bare hands and to clean up his ejaculated semen after he
20 achieved sexual orgasm.

21 14. On the second occasion involving the Defendant, Jeffrey Epstein, the Plaintiff, Katie Johnson,
22 was again forced to disrobe into her bra and panties while giving Defendant Epstein a full body
23 massage while he was completely naked. The Defendant, Donald J. Trump, was also present as he
24 was getting his own massage from another minor, Jane Doe, age 13. Defendant Epstein forced
25 Plaintiff Johnson to touch his erect penis by physically placing her bare hands upon his sex organ
26 and again forced Plaintiff Johnson to clean up his ejaculated semen after he achieved sexual orgasm.

1 15. Shortly after this sexual assault by the Defendant, Jeffrey E. Epstein, on the Plaintiff, Katie
2 Johnson, Plaintiff Johnson was still present while the two Defendants were arguing over who would
3 be the one to take Plaintiff Johnson's virginity. The Defendant, Donald J. Trump, was clearly heard
4 referring to Defendant, Jeffrey E. Epstein, as a "Jew Bastard" as he yelled at Defendant Epstein, that
5 clearly, he, Defendant Trump, should be the lucky one to "pop the cherry" of Plaintiff Johnson.

6 16. The third and final sexual assault by the Defendant, Jeffrey E. Epstein, on the Plaintiff, Katie
7 Johnson, took place after Plaintiff Johnson had been brutally and savagely raped by Defendant
8 Trump. While receiving another full body massage from Plaintiff Johnson, while in the nude,
9 Defendant Epstein became so enraged after finding out that Defendant Trump had been the one to
10 take Plaintiff Johnson's virginity, that Defendant Epstein also violently raped Plaintiff Johnson.
11 After forcing Plaintiff Johnson to disrobe into her bra and panties, while receiving a massage from
12 the Plaintiff, Defendant Epstein attempted to enter Plaintiff Johnson's anal cavity with his erect
13 penis while trying to restrain her. Plaintiff Johnson attempted to push Defendant Epstein away, at
14 which time Defendant Epstein attempted to enter Plaintiff Johnson's vagina with his erect penis.
15 This attempt to brutally sodomize and rape Plaintiff Johnson by Defendant Epstein was finally
16 repelled by Plaintiff Johnson but not before Defendant Epstein was able to achieve sexual orgasm.
17 After perversely sodomizing and raping the Plaintiff, Katie Johnson, the Defendant, Jeffrey E.
18 Epstein, attempted to strike her about the head with his closed fists while he angrily screamed at
19 Plaintiff Johnson that he, Defendant Epstein, should have been the one who "took her cherry, not
20 Mr. Trump", before she finally managed to break away from Defendant Epstein.

21 17. The Plaintiff, Katie Johnson, was fully warned on more than one occasion by both
22 Defendants, Donald J. Trump and Jeffrey E. Epstein, that were she ever to reveal any of the details
23 of the sexual and physical abuse that she had suffered as a sex slave for Defendant Trump and
24 Defendant Epstein, that Plaintiff Johnson and her family would be in mortal danger. Plaintiff
25 Johnson was warned that this would mean certain death for herself and Plaintiff Johnson's family
26 unless she remained silent forever on the exact details of the depraved and perverted sexual and
27 physical abuse she had been forced to endure from the Defendants.

1 MATERIAL WITNESSES

2 18. Tiffany Doe, a former trusted employee of the Defendant, Jeffrey E. Epstein, has agreed to
3 provide sworn testimony in this civil case and any other future civil or criminal proceedings, fully
4 verifying the authenticity of the claims of the Plaintiff, Katie Johnson. Witness Tiffany Doe was
5 employed by the Defendant, Jeffrey E. Epstein, for more than 10 years as a party planner for his
6 underage sex parties. Despite being subject to constant terroristic threats by Defendants Epstein
7 and Trump to never reveal the details of these underage sex parties at which scores of teenagers,
8 and pre-teen girls were used as sex slaves by Defendant Epstein and Defendant Trump, witness
9 Tiffany Doe refuses to be silent any longer. She has agreed to fully reveal the extent of the sexual
10 perversion and physical cruelty that she personally witnessed at these parties by Defendants Epstein
11 and Trump.

12 19. Material witness Tiffany Doe fully confirms all of Plaintiff Katie Johnson's allegations of
13 physical and sexual abuse by Defendants Donald J. Trump and Jeffrey E. Epstein. Tiffany Doe was
14 physically present at each of the four occasions of sexual abuse by Defendant Trump upon the
15 person of Plaintiff Johnson, as it was her job to witness all of the sexual escapades of Defendant
16 Epstein's guests at these underage sex parties and later reveal all of the sordid details directly to
17 Defendant Epstein. Defendant Epstein also demanded that Tiffany Doe tell him personally
18 everything she had overheard at these parties explaining to her that "knowledge was king" in the
19 financial world. As a result of these underage sex parties, Defendant Epstein was able to accumulate
20 inside business knowledge that he otherwise would never have been privy to in order to amass his
21 huge personal fortune.

22 20. Material witness Tiffany Doe will testify that she was also present or had direct knowledge
23 of each of the three instances on which Defendant Jeffrey E. Epstein physically and sexually abused
24 the Plaintiff, Katie Johnson. Tiffany Doe will testify to the fact that the Plaintiff, Katie Johnson,
25 was extremely fortunate to have survived all of the physical and sexual horrors inflicted upon her
26 by Defendants Epstein and Trump.

CLAIM FOR RELIEF

4 21. The Plaintiff, Katie Johnson, asks the court for relief against the Defendants, Donald J.
5 Trump and Jeffrey E. Epstein, in the amount of \$100,000,000.00 (One Hundred Million Dollars) as
6 a result of the Defendants aforementioned acts upon which they willfully and maliciously violated
7 the Civil Rights of the Plaintiff as stated in 18 U.S.C. ; 2241 by sexually and physically abusing the
8 then 13 year old Plaintiff Johnson under threat of harm to her and her family, and 42 U.S.C. ; 1985
9 by the Defendants conspiring to deny the Civil Rights of Plaintiff Johnson by making her their sex
10 slave.

13 | Dated: April 26, 2016

KATIE JOHNSON

Plaintiff Katie Johnson

Appearing In Pro Per